

# HOUSE OF REPRESENTATIVES

WASHINGTON, D. C. 20515

February 11, 1983

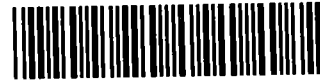
ANDY JACOBS

*CERLA* ~~\_\_\_\_\_~~

*SW*  
*RS*  
*AL/Giblin*  
*MB*

Environmental Protective Agency  
401 M Street, S.W.  
Washington, DC 20460

US EPA RECORDS CENTER REGION 5



515266

*ST (RC)*

Gentlemen:

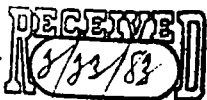
I have been asked to contact you as Congressman Jacobs' legal counsel. The enclosed information concerns the worst fears of the southside community in Indianapolis, Indiana.

Is action concerning this matter anticipated on the federal level? We urge your assistance in any manner legally possible to remedy this hazardous waste problem.

Sincerely,

*James P. Seidensticker Jr.*  
James P. Seidensticker, Jr.  
Legal Counsel to Congressman  
Andrew Jacobs, Jr.

JPS:as  
Enc.



*Use as original*

1530 S. Centennial  
Indianapolis, In 46241

January 20, 1983

TO: SENATOR RICHARD LUGAR  
SENATOR DAN QUALE

JAN 25 1983

CONGRESSMAN ANDREW JACORS

RICHARD WILSON, EPA, ENFORCEMENT DIV.

DOUGLAS MACMILLAN, EPA, HAZARDOUS WASTE DIV.

Dear Sirs:

We're sure you're familiar with our continuing problems with Reilly Tar & Chemical Co., 1500 S. Tibbs Ave., Indianapolis, In 46241.

Enclosed is a copy of a memo dated Oct. 25th, 1982, to Ralph Pickard of the Indiana State Board of Health from Jim Knoy, also of the State Board of Health, who made an inspection of the Reilly facilities.

Mr. Knoy's analysis and suggestions confirm our worst fears.

We need HELP!

*There are many  
elderly, and very young in  
our area - 299 families.  
Many genetic defects -  
Help! Ma.*

*Marion E. Altmyer*  
Marion E. Altmyer (Mrs. Wm. E.  
Pres., OAK PARK CIVIC LEAGUE  
317-244-8677  
812-827-3448

# STATE BOARD OF HEALTH

INDIANAPOLIS

*H. May*

## OFFICE MEMORANDUM

TO: Ralph C. Pickard, Technical Secretary  
Environmental Management Board

FROM: *JAK*  
Jim Knoy  
Division of Land Pollution Control

SUBJECT: Reilly Tar and Chemical CERCLA Inspection

DATE: October 25, 1982

THRU: David D. Lamm  
Karen E. Evans

On September 29, 1982, I inspected Reilly Tar and Chemical in Indianapolis with Mrs. Ginny Mahoney and Mr. Pete Rasor. At Reilly Tar and Chemical we met with Mr. Don Privetts, production manager; Mr. Bob Richman, plant engineer; and Mrs. Kim Bennett, environmental coordinator. During the inspection, Mrs. Mahoney and Mr. Rasor presented several questions relating to the RCRA application. Mrs. Mahoney will address these issues in a separate report.

My primary concern was to identify the old dumps on the facility grounds that had been used in the past for hazardous waste disposal. We identified five areas of concern.

Reilly Tar and Chemical produces various and numerous chemicals. One of the chemicals that is produced and is often dumped into these pits is pyridine. Pyridine is listed as a hazardous waste.

The first area of concern is the "lime pond" located in the northwest corner of the Reilly property. Presently, boiler blow down enters the pit causing the lime deposits. The pit was first used in 1952 for all plant wastes, including hazardous waste. Recently it has only been used for surface runoff and boiler blow down. The 127,650 square foot (approximate) pit of unknown depth is thought by company officials to be an evaporation pond. While the hot boiler blow down does in fact evaporate, the liquid waste, including surface water runoff, would, in Indiana, have a net increase in rainfall over evaporation. Therefore, there should be an overflow from the pit for the excess rainfall. Since there is no such overflow, it is assumed that the leachate from the pit enters the area groundwater. If that assumption is true, then it is further assumed that this pit is a source of contamination to the area groundwater. Information on the quantity of hazardous waste disposed of here needs to be determined.

The second area of concern is the dump area along the south edge of the property. This pit had dumped into it all types of plant waste, including hazardous waste for a long, but unknown time. It has been used until approximately three years ago to take some wastes, including

foundry sands from Detroit Diesel Allison and possibly gravel cleaned up from plant spills. None of the Reilly personnel accompanying us on the inspection were aware of leachate leaving any of the dump sites, but Mrs. Bennett mentioned that Mr. Dale Bertelson, Indianapolis Department of Public Works, monitors Reilly's effluent discharge to the sanitary sewer at the southeast corner of the property and might have noticed any leachate leaving the dump area. This dump is built up, but past records indicate, at least in part, that some of the area was a pit. This dump is the largest one on the property. It covers approximately 200,000 square feet and is of an undetermined depth.

The third area of concern is the sludge drying area located on the property south of Minnesota Street. The Water Pollution Control Division had cited Reilly in the past for this area as it was a cinder pit used for dewatering from which leachate flowed uncontrolled over the ground. During the inspection, a Reilly representative mentioned that he thought that it had been underlined with plastic at some point in the past. Mrs. Bennett said that the old pit had been removed and replaced with a new system not utilizing land disposal. She agreed to submit to me details of the removal which occurred approximately one to three years ago. Water Pollution Control Division records do indicate approval for the installation of the new drying system.

The fourth area of concern is an old trench that Mr. Privetts said had had drums buried in it. It was an old train unloading area that was as deep as the bottom of a railroad car door. It was approximately 300 feet long. It is unknown what type and the quantity of the substances that were buried there. This site was not included on the Reilly submittal of their Notification of Hazardous Waste Site, EPA Form 8900-1.

The Water Pollution Control Division has, in the past, attempted to correct these problem areas. On August 17, 1964, Mr. B. A. Poole, Technical Secretary of the Stream Pollution Control Board, sent a letter to Reilly Tar and Chemical stating that the results from inspections during May, June, and July of 1964 indicated that the groundwater in the vicinity of the Minnesota Street plant and the Reilly industrial waste lagoon waters both contained appreciable quantities of pyridine, picolines, and ammonia. The letter further stated that since the industrial waste lagoon, presumably the lime pond, is operated on the basis of ground absorption and surface evaporation, it could be concluded that the major source of groundwater pollution, as indicated on an enclosed tabulation, was the Minnesota Street industrial waste lagoon. Mr. Poole further stated that the pollution of groundwater was a violation of the Stream Pollution Control Board and that that pollution must be abated. There is no other correspondence in the Indiana State Board of Health files from that period.

On October 14, 1975, Mr. Sam Moore, Director of the Division of Water Pollution Control, sent a letter to Reilly Tar and Chemical, addressing the dump at the extreme south end of the property, the second area mentioned in this memo, which was receiving liquid waste. The letter mentioned that the dug ditch contained debris, oily tarry liquids, and liquid chemical wastes. Several drums were near the dump area containing organic chemicals, some of which had spilled on the ground. Chemical tests of liquid in a trench showed a COD of one million milligrams per liter and ammonias of 3,100 milligrams per liter. Mr. Moore requested that the company advise his office within 30 days of the date of the letter, of the company's intentions with respect to that matter. There is nothing in the files to indicate that Reilly took steps to mitigate or to study the problems with the dump at the extreme south end of the property.

Mr. Moore's letter also addressed the sludge dewatering area utilizing cinder walls and bottoms which was mentioned earlier in this report as area number three. According to this author's search of the files, only the sludge drying area mentioned was addressed by Reilly.

Reilly Tar and Chemical submitted a second EPA Form 8900-1 for a fifth area at Tenth Street and Miley Avenue that was utilized from 1896 to 1923 to store creosote wastes in above-ground drums and in tanks. That area is now partially residential and should be investigated further.

It is my recommendation that the Indiana State Board of Health take steps to further investigate the Reilly Tar and Chemical properties and past disposal practices, i.e., determine the types and quantities of wastes that were disposed of and determine what type of data gathering is needed. It may behoove the Indiana State Board of Health to collect additional data and utilize CERCLA action while it is available. The multidivisional response being coordinated by Mr. Robert Carter should incorporate this information.

JKnoy/tw

cc: Mrs. Ginny Mahoney  
Mr. Ron Weiss  
Mr. Pete Rasor  
Mr. Bob Carter